

BCR
BERLINER CORCORAN & ROWE LLP

June 20, 2025

VIA ECF

The Honorable James B. Clark III
United States Magistrate Judge
District of New Jersey
Frank Lautenberg Post Office & U.S. Courthouse 2 Federal Square
Newark, New Jersey 07102

Re: United States v. Haghighat, et al., Crim. No. 25-339

Dear Judge Clark:

We represent Bruce Haghighat, whose initial appearance was before Your Honor on May 28, 2025. Following the hearing, an Order Setting Conditions of Release was entered by the Court. One of the conditions in the Court's Order is that Mr. Haghighat is "prohibited from buying or selling publicly traded securities or directing others to do so." See *Dkt 24* at 2.

Mr. Haghighat does not have a consistent salaried position and needs to draw from his investments to fund his personal expenses and those of his company. We respectfully request the Court amend the Order Setting Conditions of Release to permit Mr. Haghighat to trade Exchange-Traded Funds ("ETF"s) and mutual funds in order for him to access needed funds. He will only trade these bundled/basket securities and will not trade individual securities.

The Government has no objection to our requested amendment. We have, for the convenience of the Court, provided a space below for Your Honor to "So Order" the relief requested, should you decide to do so.

We pray the Court grant our request and thank you for your kind consideration.

Respectfully submitted,

s/ William F Coffield
William F Coffield

s/ Laina Lopez
Laina Lopez

Counsel for Bruce Haghighat

cc: All counsel of record via ECF

So Order: s/ James B. Clark, III
Hon. James B. Clark III, U.S.M.J.

6/20/2025